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Attorneys for Defendant  
REACH MEDIA GROUP, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

DAVID TRINDADE, individually and on behalf of all others similarly situated,

CASE NO. 5:12-CV-04759 (PSG)

Plaintiff,

V.

REACH MEDIA GROUP, LLC, a  
Delaware limited liability company,

Defendant.

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO RESPOND  
TO CLASS ACTION COMPLAINT AND  
TO CONTINUE CASE MANAGEMENT  
CONFERENCE DATE AND  
CORRESPONDING DEADLINES**

Judge: Hon. Paul Singh Grewal  
Dept: Courtroom 5

1 Plaintiff David Trindade (“Plaintiff”) and Defendant Reach Media Group, LLC  
 2 (“Defendant”), stipulate and agree as follows:

3 WHEREAS:

- 4 A. DLA Piper LLP (US) was recently retained to represent Defendant in this matter;
- 5 B. Defendant’s request for a 28-day extension of time to respond to Plaintiff’s Class  
     Action Complaint is the first time Defendant has requested an extension of a deadline  
     in this matter;
- 6 C. The parties’ request for a 28-day continuance of the Initial Case Management  
     Conference and corresponding deadlines is the first time the parties have requested a  
     change to any event previously scheduled by the Court in this matter;
- 7 D. The parties agree upon the following schedule to provide Defendant with additional  
     time in which to respond to Plaintiff’s Class Action Complaint and to provide the  
     parties with additional time in which to meet and confer about their initial disclosures,  
     early settlement, ADR process selection, case management statement, and discovery  
     plan.

16  
 17       November 1, 2012: Last day for Defendant to respond to Plaintiff’s Class Action  
 18 Complaint

19       November 13, 2012: Last day to meet and confer regarding initial disclosures, early  
 20 settlement, ADR process selection, and discovery plan; file ADR Certification signed by Parties  
 21 and Counsel; file either Stipulation to ADR Process or Notice of Need for ADR Phone  
 22 Conference

23       November 27, 2012: Last day to file Rule 26(f) Report, complete initial disclosures or  
 24 state objection in Rule 26(f) Report and file Case Management Statement

25       December 4, 2012: Initial Case Management Conference (CMC) in Courtroom 5, 4th  
 26 Floor, SJ at 2:00 p.m.

27       NOW, THEREFORE, Plaintiff and Defendant, by and through their respective counsel,  
 28 stipulate and agree as follows:

Defendant's deadline to respond to the Class Action Complaint is extended to November 1, 2012.

Subject to the approval of the Court, the Initial Case Management Conference shall be rescheduled from November 6, 2012 to December 4, 2012 at 2:00 pm, or such other date and time as the Court shall order, and all corresponding deadlines shall be continued by 28 days.

IT IS SO STIPULATED.

Dated: October 4, 2012

DLA PIPER LLP (US)

By: /s/ Vishali Singal  
VISHALI SINGAL  
Attorneys for Defendant  
REACH MEDIA GROUP, LLC

Dated: October 4, 2012

EDELSON McGUIRE LLP

By: /s/ Sean P. Reis  
SEAN P. REIS  
Attorneys for Plaintiff  
DAVID TRINDADE

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1 I, Vishali Singal, am the ECF user whose identification and password are being used to  
2 file the foregoing STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME. In  
3 compliance with General Order 45, X.B., I hereby attest that the above-referenced signatories to  
4 this stipulation have concurred in this filing.

5 **ORDER**

6 Defendant Reach Media Group, LLC's deadline to respond to the Class Action  
7 Complaint is hereby extended to November 1, 2012.

8 The parties' Initial Case Management Conference is hereby extended to  
9 \_\_\_\_\_, 2012 at \_\_\_\_\_, and all corresponding dates are hereby  
10 continued by 28 days.

11  
12 IT IS SO ORDERED.

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14 DATED: \_\_\_\_\_, 2012

15 By \_\_\_\_\_  
16 HONORABLE PAUL SINGH GREWAL  
17 UNITED STATES MAGISTRATE JUDGE  
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